



Illinois Department of Natural Resources

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www.dnr.illinois.gov

Pat Quinn, Governor
Marc Miller, Director

January 23, 2013

Mr. Eric Sadler
County of Kankakee Planning Department
189 E. Court St., Room 201
Kankakee, IL 60901

Dear Mr. Sadler:

The Department has received a submission from General Energy Corporation pertaining to a proposed meteorological tower north of Grant Park, in Township 32 North, Range 13 East, Section 12, for the purpose of consultation with the Department in accordance with the *Illinois Endangered Species Protection Act* [520 ILCS 10/11], the *Illinois Natural Areas Preservation Act* [525 ILCS 30/17], and Title 17 *Illinois Administrative Code* Part 1075.

The purpose of the tower is to evaluate wind energy resources which may support subsequent construction and operation of a wind energy project using utility-scale wind turbines. It is the opinion of the Department that a wind energy facility in this vicinity may be likely to alter the essential habitat of the State-listed and federally-listed endangered **Indiana Bat**, *Myotis sodalis*, and/or other bats which may become listed in the near future. The Department offers the following information and recommendations.

This location is approximately 14 miles from the nearest known maternity colony location for the Indiana Bat, on the Kankakee River near Schneider, Indiana. It is about 70 miles east of the nearest known winter hibernaculum for this species near LaSalle, Illinois. The Indiana Bat has been shown to migrate more than 300 miles between hibernaculum and summer colonies, although lesser distances are often involved. In Illinois, Indiana Bat movements and activity appear to correlate closely with riparian corridors and wooded fencerows when large forest blocks are unavailable.

The site requested for the meteorological tower is adjacent to a tributary of Trim Creek, and both the tributary and Trim Creek in this vicinity exhibit wooded riparian corridors, while several nearby properties possess significant ponds where bat foraging activities may focus. While the meteorological tower itself is not considered a threat to the Indiana Bat, several Indiana Bats have died through collisions with utility-scale wind turbines; if the species is present along Trim Creek, wind turbines in this area will pose a risk of prohibited taking of the Indiana Bat. Placement of the meteorological tower offers an important opportunity to evaluate whether this species is present before further commitments are made.

In addition, the United States Fish & Wildlife Service is currently evaluating petitions to consider several other bat species for federal listing. Furthest along in this process is consideration of the **Northern Long-Eared Bat**, *Myotis septentrionalis*, also known as the Northern Myotis. Currently, the Northern Long-Eared Bat is thought to occur in all Illinois Counties, including Kankakee County. This species is also proven vulnerable to collisions with wind turbines. While evaluating wind resources in this vicinity, it behooves the applicant to evaluate the bat species using this area.

Recommendation #1: The applicant should use the opportunity presented by the placement of the meteorological tower to acoustically evaluate the presence of bat species in the vicinity.

Recommendation #2: The meteorological tower should be planned to support acoustic equipment capable of detecting and recording bat calls for later analysis. Several vendors have available acoustic monitors specially designed to register and record bat calls for later analysis using proprietary softwares. Many bat species can be positively identified by their calls. This is less true, however, for species in the *Myotis* genus, whose calls are more difficult to differentiate. In recent years, the most valuable approach has been to place monitors on meteorological towers, one near ground level, and one as near the apex of the tower as possible. (Different bat species tend to use different elevations during active periods.) This method has been successful in estimating the amount of bat activity near monitoring stations. Generally, bat activity begins in early to mid-April and extends through October into November.

Recommendation #3: Concurrent with acoustic monitoring, the applicant should conduct mist-netting surveys in the vicinity in 2013 to positively identify bat species, genders, ages, and reproductive conditions. While the presence of any Indiana Bats in the vicinity is a matter for concern, many federal conservation guidelines are related to the proximity of maternity colonies. The mean foraging distance from a maternity colony of the Indiana Bat is often stated to be 2.5 miles (4 km), suggesting that female bats may forage as far as 5 miles (8 km). Elsewhere in Illinois, a lactating female was tracked five miles to her roost from the point of capture. While an acoustic analysis may indicate the presence of a species, it cannot indicate numbers, gender, or reproductive condition. A mist-netting survey is needed for this purpose. The Department strongly recommends that points *outside* the proposed wind farm, as well as those within, be included in mist-netting surveys. In this case, points along Pike Creek, within the City of Grant Park (particularly around Lake Matonga), and along Trim Creek southward toward the Kankakee River may be most productive. Exline Slough, though it runs across the proposed project area, appears to lack appropriate mist-netting set points in the vicinity of the proposed wind energy project. Maternity indicators, such as lactation, are limited to June and early July, with the former being an optimal month for such surveys.

Consultation on the part of the Department is terminated, unless Kankakee County desires additional information or advice related to this proposal. In accordance with 17 Ill. Adm. Code 1075.40(h), the County must notify the Department of its decision regarding these recommendations, whether it will:

- Proceed with the action as originally proposed;
- Require the action to be modified per Department recommendations (please specify which measures if not all will be required); or
- Forgo the action.

This consultation is valid for two years unless new information becomes available which was not previously considered; or the proposed action is modified; or additional species, essential habitats, or Natural Areas are identified in the vicinity. If the project has not been implemented within two years of the date of this letter, or any of the above listed conditions develop, a new consultation is necessary.

The natural resource review primarily reflects the information existing in the Illinois Natural Heritage Database at the time of this consultation, and should not be regarded as a final statement on the site being considered, nor should it be a substitute for detailed site surveys or field surveys required for environmental assessments.

If additional protected resources are encountered during the project's implementation, the applicant must comply with the applicable statutes and regulations. Also, note that termination does not imply IDNR's authorization or endorsement of the proposed action. Please contact me if you have questions regarding this review.

Sincerely,

A handwritten signature in black ink, reading "Keith M. Shank". The signature is written in a cursive style with a stylized "K" and "S".

Keith M. Shank
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cc: Prem Mehrotra, General Energy Corporation